

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

FORT TRANSFER COMPANY, INC.	)	
	)	
Plaintiff,	)	
	)	
vs.	)	Case No. 06 C 3529
	)	Judge Andersen
CENTRAL STATES, SOUTHEAST AND	)	Magistrate Judge Brown
SOUTHWEST AREAS PENSION FUND,	)	
	)	
Defendant.	)	

**DEFENDANT'S UNOPPOSED MOTION FOR  
ENTRY OF CONSENT JUDGMENT FOR ATTORNEYS' FEES**

**NOW COMES** the Defendant and moves for the entry of a consent judgment for attorneys' fees and in support states as follows:

1. This Court entered a Memorandum Opinion and Minute Order on March 6, 2007 which granted the Defendant's Motion to Dismiss. On May 4, 2007, a Minute Order dismissing the case with leave to reinstate within 60 days was entered.

2. In accordance with Local Rule 54, Central States provided Fort with information detailing the \$67,625 in attorneys' fees incurred by Central States in connection with this case. The parties have conferred with respect to the fee issue and agree that the full \$67,625 is due. As a result, they have entered into the attached Consent Judgment with respect to attorneys' fees.

WHEREFORE, the Defendant requests that the attached Consent Judgment be entered.

Respectfully submitted,

/s/ Albert M. Madden

Albert M. Madden

One of the attorneys for Defendant Central States,  
Southeast and Southwest Areas Pension Fund

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May 24, 2007

**CERTIFICATE OF SERVICE**

I, Albert M. Madden, one of the attorneys for Defendant Central States, Southeast and Southwest Areas Pension Fund, certify that on May 24, 2007, I caused the foregoing Notice of Unopposed Motion and the Defendant's Unopposed Motion for Entry of Consent Judgment for Attorneys' Fees to be filed electronically. This filing was served on all parties indicated on the electronic filing receipt via the Court's electronic filing system.

/s/ Albert M. Madden  
Attorney for Defendant Central States, Southeast  
and Southwest Areas Pension Fund